

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:13-CR-534
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	
)	
DEONTE TATE,)	<u>MOTION FOR LEAVE TO FILE UNDER</u>
)	<u>SEAL</u>
Defendant.)	

Now comes the United States of America, by and through counsel, Steven M. Dettelbach, United States Attorney, and Kelly J. Galvin and Miranda E. Dugi, Assistant United States Attorneys, and respectfully requests under Federal Rule of Criminal Procedure 26.2(d)(1) that the Court allow the government to file a notice of discovery under seal. This disclosure remains unconfirmed pending receipt of verifying documentation, and poses potential reputational harm to the witness. The United States requests that this information remain under seal until

documentation confirming or modifying this information has been obtained, or until the witness has been cross-examined in a hearing on the record.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March 2014, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Miranda E. Dugi

Miranda E. Dugi

Assistant U.S. Attorney